

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN JOSEPH KELLY AND KARRIEM
BEY, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

REALPAGE, INC., d/b/a On-Site and RP On-
Site LLC,

Defendants.

Civil Action No. 2:19-cv-1706-JDW

Plaintiffs Kevin Joseph Kelly and Karriem Bey, through their undersigned counsel, hereby seek leave to file under seal portions of the Memorandum of Law in Support of the forthcoming Motion for Class Certification, as well as Exhibits 5, 15, 19, 20, 24, and portions of Exhibits 1, 2, 3, and 4. The portions of the Memorandum sought to be filed under seal refer to the documents and testimony contained in the Exhibits described above.

Exhibits 1 through 4 are the transcripts of the depositions of Defendant's corporate representatives, portions of which Defendant designated "Confidential" pursuant to the stipulated protective order in this matter. ECF 27.

Exhibit 5 is a response to discovery requests that Defendant designated "Confidential" pursuant to the stipulated protective order. *Id.*

Exhibit 15 is a natively produced document from Defendant's business records that Defendant produced in discovery in this matter, which it designated "Confidential" pursuant to the stipulated protective order. *Id.*

Exhibit 19 is a document Defendant produced in discovery in this matter, which it designated "Confidential" pursuant to the stipulated protective order. *Id.*

Exhibit 20 is a document Defendant produced in discovery in this matter, which it designated “Confidential” pursuant to the stipulated protective order. *Id.*

Exhibit 24 is a response to discovery requests that Defendant designated “Confidential” pursuant to the stipulated protective order. *Id.*

Pursuant to Local Civil Rules 5.12 and 5.1.5(a)(2) and paragraph IX of the protective order, Plaintiff makes this motion for leave to file the above-referenced documents under seal. Pending the Court’s ruling on this motion, Plaintiff will file redacted version of the documents. Should the Court find that any of the material referenced herein be publicly filed, Plaintiff will promptly refile unredacted versions of same.

Dated: July 10, 2020

Respectfully submitted,

KEVIN JOSEPH KELLY and KARRIEM BEY,
by their attorneys,

/s/John Soumilas

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed on this date and that service is therefore being made electronically on counsel of record for Defendant.

Date: July 10, 2020

/s/ John Soumilas
John Soumilas